



ATTORNEYS AT LAW

**Joseph L. Schwartz**  
Partner

Direct:  
t: 973.451.8506  
f: 973.451.8727  
jschwartz@riker.com

Headquarters Plaza  
One Speedwell Avenue  
Morristown, NJ 07962-1981

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**Via Electronic Filing**

Honorable Michael B. Kaplan, U.S.B.J.  
United States Bankruptcy Court for the District of New Jersey  
Clarkson S. Fisher U.S. Courthouse, 2<sup>nd</sup> Floor  
402 East State Street  
Trenton, NJ 08608

**Re: In re Hollister Construction Services, LLC**  
**Case No. 19-27439 (MBK)**

Dear Judge Kaplan:

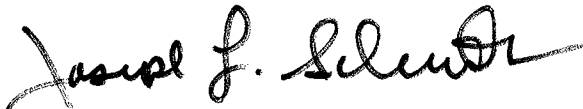
We represent Newark Warehouse Urban Renewal, LLC and Newark Warehouse Redevelopment Company, LLC (together, the "NWR Entities"). I write in response to the Debtor's e-mail objection to the Court at 6:24 p.m. today to the Order Shortening Time [Docket No. 742] that the Court entered earlier today in connection with the NWR Entities' Motion for an Order Determining that Certain Parties Have Violated the Automatic Stay, That Certain Asserted Liens Filed Post-Petition Are Void Ab Initio, Confirming the Applicability of the Automatic Stay to The Pending Construction Lien Litigations and For Related Relief [Docket no. 740].

First, we find it quite ironic that the Debtor, which just requested and last week received virtually the same relief from the Court, with respect to other projects *where the owners had settled*, is now potentially planning to object to the NWR Entities' motion. Next, we further find it ironic that the Debtor, which requests orders shortening time for virtually every motion it files in this case, has the audacity to object to a nondebtor's request for an order shortening time. Finally, it is quite puzzling why the Debtor is taking the position that it is taking, as the relief requested in the NWR Entities' motion clearly benefits the estate, as is discussed in the NWR Entities' motion. Perhaps it has something to do with improperly attempting to gain leverage in the continuing settlement discussions between the NWR Entities and the Debtor.

In accordance with the Court's entered Order Shortening Time, we have served the NWR Entities' motion on all necessary parties via e-mail and are also sending the motion out tonight via overnight mail. A certification of service will be filed on the Court's electronic docket tomorrow reflecting this service. We submit that the hearing on the NWR Entities' motion should go forward on January 9, in accordance with the Court's entered Order Shortening Time.

I am available at the Court's convenience to discuss.

Respectfully submitted,



Joseph L. Schwartz

cc: Mary E. Seymour, Esq.